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5 *Jiangtian Sun and Sun Timepiece Trade, LLC*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 DEV ANANTH DURAI,

10 Plaintiff,

11 v.

12 JIANGTIAN SUN, individually, and SUN
13 TIMEPIECE TRADE, LLC, a Nevada
Limited Liability Company; DOES 1 through
14 10, inclusive; DOES & ROES
CORPORATIONS ENTITIES 1 through 10
15 inclusive;

16 Defendants.

Case No. 2:19-cv-00670-APG-GWF

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF TO
REPLY TO SPECIALLY APPEARING
DEFENDANTS JIANGTIAN SUN AND
SUN TIMEPIECE TRADE, LLC
MOTION TO DISMISS**

(PLAINTIFF’S FIRST REQUEST)

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18 Plaintiff Dev Ananth Durai (“Plaintiff”) and Specially Appearing Defendants Jiangtian
19 Sun and Sun Timepiece Trade, LLC (“Specially Appearing Defendants”) by and through their
20 respective counsel of record, hereby stipulate and agree, with the Court’s approval, as follows:

21 **RECITALS**

22 WHEREAS, Plaintiff filed a complaint in this action initiating Case No. 2:19-cv-00670-
23 APG-GWF on April 18, 2019 (*See* ECF No. 1.);

24 WHEREAS, Plaintiff filed an amended complaint in this action on April 23, 2019 (*See*
25 ECF No. 5.);

26 WHEREAS, Specially Appearing Defendants’ filed a Motion to Dismiss Complaint on
27 May 23, 2019 (Doc. 14), pursuant to stipulation and order to extend time for Defendants’ to file
28

1 said responsive pleading (Doc. 13).

2 WHEREAS, Plaintiff's Reply in Opposition to Motion to Dismiss is due on June 6, 2019;

3 WHEREAS, Specially Appearing Defendants and Plaintiff agree to allow Plaintiff by this
4 stipulation and order up through June 19, 2019;

5 This is Plaintiff's first request for an extension of time to respond to Specially Appearing
6 Defendants' responsive pleading; this request from Plaintiff is not made for any improper purpose
7 or for the purpose of delay or bad faith; Plaintiff is requesting the extension due to unavailability
8 of Plaintiff's Counsel from May 28, 2019 to June 19, 2019 for a previously scheduled overseas
9 trip.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
11 their counsel, as follows:

12 Plaintiff shall file his response to Defendants' Motion to Dismiss by or on June 19, 2019.

13 **SO STIPULATED.**

14
15 DATED: June 3, 2019

The Thater Law Group, P.C.

16 By: /s/ M. Lani Esteban-Trinidad
17 M. LANI ESTEBAN-TRINIDAD
18 *Attorney for Plaintiff*
Dev Ananth Durai

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20 DATED: June 3, 2019

Enenstein Pham & Glass

21 By: /s/ Robert A. Rabbat
22 ROBERT A. RABBAT, ESQ.
23 *Attorney for Specially Appearing Defendants*
Jiangtian Sun a/k/a John Sun d/b/a as
Sun Timepiece Trade, LLC

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25 **IT IS SO ORDERED:**

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27 Dated: June 4, 2019.


UNITED STATES DISTRICT JUDGE